



# Orthodox Union

Union of Orthodox Jewish Congregations of America • איחוד קהילות האורתודוקסים באמריקה

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August 12, 2005

Arthur Neal, Director, Program Administration

National Organic Program

USDA -AMS-TMP-NOP

1400 Independence Ave., SW., Room 4008

So. Ag Stop 02687

Washington, DC 20250

Dear Mr. Neai,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7CFVR 205, National Organic Program Sunset Review process

The Orthodox Union (OU) thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material:

Carbon dioxide (CFR 206.605). Carbon dioxide is used principally to control bug infestation in grains, grain derivatives, and other ingredients. Kosher law prohibits eating foods infested, or potentially infested, with bugs. Relaxing the ability to control infestation in organic ingredients may require kosher certifying agencies to disallow the companies they certify from purchasing those organic ingredients that may be affected by infestation problems. Since some kosher certified companies are also certified organic, such companies would be left in a bind.

In addition, kosher-observant consumers may have to be advised against purchasing those organic ingredients or products that would be affected by a ban on the use of carbon dioxide.

Thank you for your time and consideration,

Rabbi Gabriel Price  
Ingredients Approval Registry  
Orthodox Union  
11 Broadway  
New York, NY 10004

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